



## Raw Materials Supply Chain Policy

March 1, 2023

As one of the world's leading manufacturers of tungsten powders, Global Tungsten & Powders (GTP) is committed to ensuring that our raw materials are sourced responsibly. Our Supplier Policy and Code of Conduct set forth our corporate commitments to ethical business practices and legal compliance and we only do business with suppliers that adhere to these commitments.

The Division's only location with tungsten smelting/refining capability, located in Towanda/USA, has implemented processes and procedures to ensure that our sourcing does not support, or benefit armed conflict groups or involve serious abuses of human rights. Our facility in Jyvaskyla, Finland only processes tungsten containing secondary raw materials and our facilities in Bruntal, Czech Republic and Niederkorn, Luxembourg only source raw materials from our location in Towanda, USA and other smelters that are included on the Conformant Tungsten Smelter List of the Responsible Minerals Assurance Process (RMAP) ([RMAP Conformant Tungsten Smelters \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org))

GTP complies with United Nations sanctions resolutions and, where applicable, the domestic laws (e.g., Section 1502 of the Dodd Frank Act) implementing such resolutions, and we endorse the activities of the Organization for Economic Co-Operation and Development (OECD) and use the recommendations in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas (OECD Guidance) as the model for our own due diligence.

In accordance with the OECD Guidance <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf> GTP strongly condemns all activities, and will refuse any material, which we believe benefitted or supported armed rebels/terrorist groups through illegal finance or other activities or involved serious human rights violations associated with the extraction, handling, transport or trade of minerals, including:

- Serious abuses (i.e., torture, cruel, inhuman, and degrading treatment; forced for compulsory labor; worst forms of child labor; human rights violations and abuses such as widespread sexual violence; war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide).
- Direct or indirect support to non-state armed groups and public or private security forces.
- Bribery and fraudulent misrepresentation of the origin of minerals.
- Money laundering.
- Non-payment of taxes, fees, and royalties to governments.

Should GTP, through our ongoing due-diligence, market intelligence and publicly available whistle-blower system, discover that our suppliers are engaged in practices that do not meet our responsible sourcing requirements, we would immediately inform the supplier that we are suspending sourcing from said supplier and develop a plan to mitigate the identified risks. Should the mitigation fail to resolve the identified risks to our satisfaction, or should we find further

activities which indicate extreme abuses, dishonesty, or situations where a supplier is unwilling to assist in our due diligence, GTP will immediately discontinue any activity with said supplier.

In the GTP Manual for Responsible Sourcing of Tungsten Raw Materials we have implemented a management system in accordance with the OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas (CAHRA) to ensure all tungsten containing and other relevant raw materials are sourced in a manner that does not support or benefit unlawful armed conflicts or contribute to serious human rights abuses or breaches in international humanitarian law.

In alignment with the OECD Guidance, GTP is committed to be audited by an independent 3rd party to ensure transparency and assurance to our customers that GTP's supply chain due diligence policy is verifiable and effective. GTP was first determined conformant with the Responsible Business Alliance RMI - RMAP Assessment Standard (then CFSP) ([Tungsten Smelter List \(responsiblemineralsinitiative.org\)](#) December 2013, January 2015, May 2019 and then September 2022 continues to engage in this independent assessment annually.

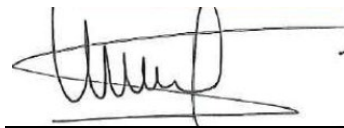
GTP communicates the included Supply Chain Policy to our suppliers and customers and makes it publicly available for review. Additionally, GTP requires that our suppliers contractually acknowledge our policy and commit to providing information, documentation, and accommodations for site-visits as necessary for conducting our own due diligence. In alignment with the OECD Guidance, GTP annually publishes and makes publicly available the Global Tungsten & Powders Corp Due Diligence Reports for Minerals Supplies from Conflict Affected and High-Risk Areas ([Responsible Sourcing and Supply Chain Transparency | Global Tungsten & Powders Corp.](#))

Our Strategic Raw Materials Purchasing Manager, Mr. Cristian Kommer ([Cristian.Kommer@globaltungsten.com](mailto:Cristian.Kommer@globaltungsten.com)) is assigned with responsibility for ensuring that all tungsten is sourced in a legitimate and ethical manner and according to our policies and procedures.

In case of concerns related to GTP's sourcing and sourcing practices, all employees at GTP, suppliers, customers and other stakeholders are encouraged to contact the Strategic Raw Materials Purchasing Manager or anonymously communicate their concerns related to GTP, at [NAVEX - Incident Reporting \(ethicspoint.com\)](#) or [Grievance Mechanism \(responsiblemineralsinitiative.org\)](#)



Eric Rowe  
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Director of Raw Material Sourcing & Planning



Cristian Kommer  
Strategic Raw Material Purchasing  
Manager

Revision	Date	Author	Reason for Change
4	3/1/2023	Cristian Kommer / Marie Girven	RMI update March2023